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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF
JANAIZE MARKLAND IN SUPPORT OF
D&O INSURANCE MOTION**

Date: July 9, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

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2 I, Janaize Markland, pursuant to section 1746 of title 28 of the United States Code, hereby
3 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
4 information, and belief:

5 1. I hold the position of Senior Director, Enterprise and Operational Risk Management
6 & Insurance at Pacific Gas and Electric Company (the “**Utility**”), as debtor and debtor-in-
7 possession (and together with PG&E Corporation, the “**Debtors**”), in the above-captioned Chapter
8 11 Cases (the “**Chapter 11 Cases**”).

9 2. Except as otherwise indicated herein, the facts set forth in this Declaration are based
10 upon my personal knowledge, my review of relevant documents, and information provided to me
11 by the Debtors’ employees, insurance brokers, and legal, restructuring, and financial advisors. If
12 called upon to testify, I would testify competently to the facts set forth in this Declaration. I am
13 authorized to submit this Declaration on behalf of the Debtors.

14 3. This Supplemental Declaration is submitted in further support of the *Motion*
15 *Pursuant to 11 U.S.C. §§ 105(a) and 363(b) and Fed. R. Bankr. P. 2002 and 6004(h) Authorizing*
16 *Debtors to Purchase Directors and Officers Insurance* (the “**Motion**”),¹ and the *Debtors’ Reply in*
17 *Support of the D&O Insurance Motion and Response to Objection of the Official Committee Of*
18 *Unsecured Creditors* (the “**Reply**”).

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26 ¹ Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such
27 terms in the Motion.
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1 4. In the course of my employment by the Debtors, it is my responsibility to stay
2 apprised of and evaluate the status of coverage of the Debtors and their directors and officers under
3 the D&O insurance policies.

4 5. I obtain this knowledge through reviewing correspondence received from the
5 Debtors' D&O insurers, and communicating with others who communicate with the Debtors'
6 D&O insurers regarding coverage issues, including the Debtors' internal and external counsel, and
7 their insurance broker, Marsh.

8 6. Attached to this Declaration as **Exhibit A** is the following correspondence sent by
9 the Debtors' D&O primary insurers to the Debtors' legal department regarding notices of claims
10 made, coverage, and reservations of rights in respect of derivative actions filed against the Debtors
11 and their officers and directors arising from the 2018 wildfires:

- 12 a. letter from Bailey Cavalieri on behalf of Associated Electric & Gas Insurance
13 Services Limited and AEGIS Insurance Services, Inc. (collectively "**AEGIS**")
14 to the Utility, dated January 23, 2019; and
15 b. letter from Bailey Cavalieri on behalf of AEGIS to the Utility, dated May 10,
16 2019.
17 (collectively, the "**AEGIS Letters**")

18 7. AEGIS is the Debtors' primary D&O insurer under the 2017 Policies and the 2018
19 Policies. I was provided these letters, as well as other correspondence from the Debtors' insurers,
20 by the Debtors' legal department and reviewed each of them in the ordinary course of my
21 employment shortly after their receipt.

22 8. Each of the AEGIS Letters contains a statement that AEGIS is provisionally treating
23 certain claims noticed by the Debtors relating to the 2018 wildfires as a single claim along with
24 claims previously noticed by the Debtors in relation to the 2017 wildfires.

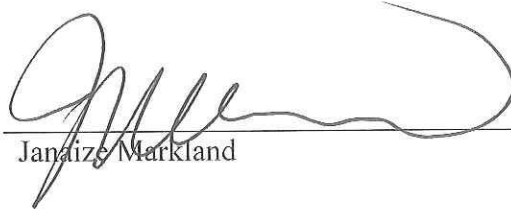
25 9. The AEGIS Letters provided to me by the Debtors' legal department, together with
26 discussions with Marsh and the Debtors' internal and external counsel, are the basis for the
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1 statements in paragraph 10 of my Declaration dated June 10, 2019, to which I testified in my
2 deposition with respect to the D&O insurers treating claims arising from the 2017 and 2018
3 wildfires as a single claim, and that one carrier had indicated an intention to do so.

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Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief, and that this declaration was executed at San Francisco, California on July 8, 2019.



Janaize Markland